



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SK/JAM/AFM  
F. #2016R02228

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 13, 2021

By Email

Zachary Margulis-Ohnuma  
Law Office of Zachary Margulis-Ohnuma  
260 Madison Avenue, 17th Floor  
New York, NY 10016

Re: United States v. Aleksandr Zhukov  
Criminal Docket No. 18-633 (S-1) (EK)

Dear Mr. Margulis-Ohnuma:

The government writes, in response to your request and as a courtesy, to provide additional information regarding the representative from Platform 4 and the representative from Platform 2 who are expected to testify at trial.

**Testimony of White Ops Representative**

Dimitris Theodorakis, Senior Director of Engineering at HUMAN (formerly White Ops), is expected to testify regarding the internet traffic logs and data provided by White Ops in connection with this case, abnormalities observed in the data, and indicia from the data demonstrating that certain IP addresses were associated with non-human internet traffic and fraud. A copy of Mr. Theodorakis's curriculum vitae has been provided to you as 3500-DT-3. Mr. Theodorakis will testify that the White Ops internet traffic logs and data collected information about the traffic associated with the IP addresses set forth in GX 1, GX 1A, and GX 2, and that some of that information exhibited abnormalities and indicia of non-human internet traffic. Mr. Theodorakis will describe the scope of the logs and data collected by White Ops. Mr. Theodorakis will explain what the information showed for the traffic associated with the IP addresses set forth in GX 1, GX 1A, and GX 2, and abnormalities in that information indicating that those IP addresses were associated with non-human internet traffic. In broad categories, the information includes, but is not limited to, information about (and anomalies in): time zone, city, and state; ASN, ISP and org; headers; plugins; user agent string, browser type, and operating system; time of day of impressions; mouse move; screen size and depth; and supported voices. Mr. Theodorakis will explain that this information exhibited anomalies intrinsic in the data itself and in relation to organic traffic at the time. Mr. Theodorakis will further testify that the White

Ops internet traffic logs and data reflect that the foregoing traffic purported to involve visits to the domains set forth in GX 3 (whereas White Ops collected data evidencing visits to blank pages) and the URLs set forth in GX 4 (whereas White Ops collected data evidencing URLs that did not work and/or had anomalous naming conventions).

**Testimony of Google Representative**

Per Bjorke, Senior Product Manager, Ad Traffic Quality at Google, is expected to testify regarding the internet traffic logs and data provided by Google in connection with this case, abnormalities observed in the data, and indicia from the data demonstrating that certain IP addresses were associated with non-human internet traffic and fraud. A copy of Mr. Bjorke's curriculum vitae has been provided to you as 3500-PB-1. Mr. Bjorke will testify that the Google internet traffic logs and data collected information about the browsers at the IP addresses set forth in GX 1, GX 1A, and GX 2. In broad categories, the information includes, but is not limited to: cookie lifespan (which indicated that the browsers supposedly viewing the ads had extremely limited history viewing other sites where Google served ads); time of day (which reflected round-the-clock computer activity not consistent with organic traffic at the time); time on site and other viewability metrics (which reflected a sharply segmented and non-organic distribution of viewing time); port (which indicated Linux devices); user agent string (which, in contrast to the port, indicated Windows-based browsers); mouse move; referrer; and screen size. Mr. Bjorke will indicate that Google calculated the impact on its clients of invalid traffic from these IP addresses, and found it to total approximately \$7.6 million, including platform fees paid to Google.

Respectfully submitted,

MARK J. LESKO  
Acting United States Attorney

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